

Steven S. Biss

From: "Steven S. Biss" <stevenbiss@earthlink.net>
Date: Saturday, April 14, 2018 11:29 AM
To: <Jess@exposefacts.org>
Cc: "Steven Biss" <stevenbiss@earthlink.net>; "Trevor FitzGibbon" <VoxVeritas@protonmail.com>
Subject: Spoliation Of Evidence

Ms. Radack,

You intentionally disregarded my preservation letter and spoliated evidence by deleting from your Twitter account every offending tweet of and concerning Trevor Fitzgibbon.

I expected better from you. The United States District Court expects that lawyers and litigants understand their duty to preserve evidence. You have committed a very serious breach of duty and you can be assured that I will bring your spoliation to Judge Payne's attention at the earliest opportunity.

I request that you refrain from destroying any further evidence. I also request that you refrain from instructing clients, such as Thomas Drake, to delete tweets and ESI. As you know, the hard drives of your computers and your clients' computers are discoverable.

Please consult an attorney if you have any question about your duty to preserve ESI and other evidence.

Steven S. Biss
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Tel.: (804) 501-8272
Fax: (202) 318-4098
Email: stevenbiss@earthlink.net
Email: ssbiss@yahoo.com